

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

ROBERT DAVID STEELE <u>et al</u>)	
)	
Plaintiffs,)	
)	
v.)	<u>Case 3:17-cv-601-MHL</u>
)	
)	
JASON GOODMAN <u>et al</u>)	
)	
Defendants.)	
)	

**PLAINTIFFS' MEMORANDUM IN SUPPORT
OF REVISED MOTION FOR A PROTECTIVE ORDER**

Plaintiffs, Robert David Steele and Earth Intelligence Network (“Plaintiffs”), by counsel, pursuant to Local Civil Rule 7(F), respectfully submit this Memorandum in Support of their revised motion for a protective order. [*ECF No. 159*].

1. Discovery in this matter will necessarily involve the identification and disclosure of confidential and proprietary information, including the names of Plaintiffs’ donors, supporters and witnesses.

2. In order to preserve the confidentiality of certain documents and information, ensure the privacy of witnesses, and facilitate discovery, the Court should enter a Protective Order.

3. Without a Protective Order, Defendant Goodman is at liberty to harass Plaintiffs’ witnesses, to publish (dox) the names, email addresses and telephone numbers of those persons in his videos, subjecting those witnesses to potential harm, and to disclose otherwise confidential financial information on the Internet and via social media.

4. Good cause exists for the entry of a Protective Order.

CONCLUSION

For the reasons stated above, Plaintiffs respectfully request the Court to grant their revised motion for a protective order, and enter the Protective Order attached to Plaintiffs' revised motion.

DATED: August 7, 2019

ROBERT DAVID STEELE
EARTH INTELLIGENCE NETWORK

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CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2019 a copy of the foregoing was filed electronically using the Court's CM/ECF system, which will send notice of electronic filing to counsel for Defendant, Patricia A. Negron, and all interested parties receiving notices via CM/ECF. I also certify that a copy of this pleading was emailed in PDF to Defendants, Goodman and Lutzke

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